

REMARKS

Claims 1, 3, 9-13, 17-19, 21, 26, 28, and 32 are pending in this application.

The Examiner rejected claims 1, 3, 9-11, 13, 17-19, 21, 26, 28, and 32 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent Application Publication No. 20030210252 to Ludtke et al. ("*Ludtke et al.*") in view of U.S. Patent No. 6,370,198 to Washino ("*Washino*") and further in view of U.S. Patent Application Publication No. 20050097245 to Lym et al. ("*Lym et al.*"). Applicant respectfully traverses this rejection.

Ludtke et al. cannot be relied upon in a § 103(a) rejection because the Examiner relies on *Ludtke et al.* as prior art under § 102(e), and *Ludtke et al.* and the instant application were, at the time the instant invention was made, owned by the same person or subject to an obligation of assignment to the same person. *Ludtke et al.* does not qualify as prior art under 35 U.S.C. §§ 102(a) or 102(b) because *Ludtke et al.* has a publication date of July 15, 2003, which is later than the filing date of the instant application of September 13, 2000. The Examiner relies on *Ludtke et al.* under §102(e). However, *Ludtke et al.* and the instant application were, at the time the instant invention was made, owned by the same person or subject to an obligation of assignment to the same person. *Ludtke et al.* was owned by Sony Corporation, with offices in Tokyo, Japan, and Sony Electronics, Inc., with offices in Park Ridge, New Jersey. Sony Electronics, Inc. was a wholly-owned subsidiary of Sony Corporation. See MPEP §706.02(I)(2). The instant application is also owned by Sony Corporation. Thus, *Ludtke et al.* cannot be relied upon in a § 103(a) rejection.

Similarly, *Lym et al.* cannot be relied upon in a § 103(a) rejection because the Examiner relies on *Lym et al.* as prior art under § 102(e), and *Lym et al.* and the instant application were, at the time the instant invention was made, owned by the same

person or subject to an obligation of assignment to the same person. *Lym et al.* does not qualify as prior art under 35 U.S.C. §§ 102(a) or 102(b) because *Lym et al.* has a publication date of May 5, 2005, which is later than the filing date of the instant application of September 13, 2000. The Examiner relies on *Lym et al.* under § 102(e). However, *Lym et al.* and the instant application were, at the time the instant invention was made, owned by the same person or subject to an obligation of assignment to the same person. *Lym et al.* was owned by Sony Corporation, with offices in Tokyo, Japan, and Sony Electronics, Inc., with offices in Park Ridge, New Jersey. Sony Electronics, Inc. was a wholly-owned subsidiary of Sony Corporation. The instant application is also owned by Sony Corporation. Thus, *Lym et al.* cannot be relied upon in a § 103(a) rejection.

As shown on the first page of *Lym et al.*, *Lym et al.* claims priority, through a continuation-in-part, to U.S. Patent No. 5,991,520 ("520 patent"). The '520 patent issued on November 23, 1999, between the priority date and U.S. filing date of the instant application. The Examiner has not, however, cited the '520 patent in any rejection. For the Examiner's convenience, a copy of the '520 patent is enclosed.

Washino fails to teach or suggest each and every element of claim 1. For example, the Examiner acknowledges that *Washino* does not teach or suggest that "said information pertaining to said first and second functional blocks stored within said memory includes information indicative of specific capabilities of said first and second functional blocks and virtual plug information of said first and second functional blocks and the virtual plug information of said second functional block contains information indicating that the input plug of said second functional block is connected to said first

functional block,” as recited in claims 1, 19, 26, and 32 (Office Action, pg. 4, paragraph 1).

Thus, because claims 3, 9, 10-13, 17, and 18 are dependent from claim 1; claim 21 is dependent from claim 19; and claim 28 is dependent from claim 26, claims 1, 3, 9-11, 13, 17-19, 21, 26, 28, and 32 should be allowed over *Ludtke et al.*, *Washino*, and *Lym et al.*

The Examiner rejected claim 12 under 35 U.S.C. § 103(a) as being unpatentable over *Ludtke et al.* in view of *Washino* and further in view of *Lym et al.* and further in view of U.S. Patent No. 5,923,673 to Henrikson (“*Henrikson*”). Applicant respectfully traverses this rejection.

As explained above, *Ludtke et al.* and *Lym et al.* cannot be relied upon by the Examiner in a § 103(a) rejection. Furthermore, claim 12 depends from claim 1, and *Washino* fails to teach or suggest each and every element of claim 1, as explained above.

The Examiner relies on *Henrikson* to make up for the deficiencies of *Washino*. However, *Henrikson* fails to make up for the deficiencies of *Washino* because *Henrikson* also does not appear to teach or suggest, for example, “said information pertaining to said first and second functional blocks stored within said memory includes information indicative of specific capabilities of said first and second functional blocks and virtual plug information of said first and second functional blocks and the virtual plug information of said second functional block contains information indicating that the input plug of said second functional block is connected to said first functional block,” as recited in claim 1.

Thus, claim 12 should be allowed over *Ludtke et al.*, *Washino*, *Lym et al.*, and *Henrikson*.

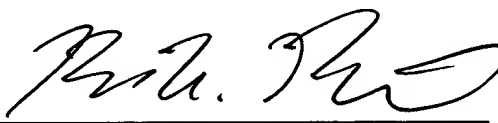
In view of the foregoing remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: December 22, 2005

By: 

Reece Nienstadt
Reg. No. 52,072